

U.S. Patent No. 6,380,959 to Wang et al. (hereinafter "Wang"), and U.S. Patent No. 6,141,005 to Hetherington et al. (hereinafter "Hetherington").

Applicants have amended independent claims 1, 8, and 14, and also dependent claims 2, 3, 5, 9, and 15. Support for the changes to the claims may be found throughout the originally filed Specification and the Drawings, and at least at, for example, page 4, lines 3-11, and page 5, lines 4-23. Applicants have canceled claims 4, 7, 10, 13, and 17, leaving claims 1-3, 5, 6, 8, 9, 11, 12, and 14-16 now pending. No new matter is added by the amendments.

Amended Independent Claim 1

Neither Wang, Hetherington, nor Hickey, separately, or in any combination, teaches or suggests the generation of a software object to be operated on a handheld computing device to provide a graphical human-machine interface. In addition, the references do not teach or suggest that the interface is adapted to control at least one parameter of a process. Applicants thus submit that amended claim 1, and its dependent claims (2, 3, 5, and 6) are patentable.

Wang does not teach or suggest operating a software object on a handheld portable computing device. Generally, Wang describes an architecture for web-based calendaring and scheduling. The architecture includes a Web calendar located on a computer. (Wang at col. 7, lines 1-3.) The Web Calendar may have a plurality of calendar event programs associated with it. (Wang at col. 7, lines 10-30.) The calendar may be downloaded to a second computer from the Internet or from an intranet. (Wang

at col. 10, lines 49-52.) Wang does not teach or suggest that the downloading computer may be a handheld computing device.

Hetherington also does not teach the use of a handheld portable computing device. Hetherington does not teach or suggest the operation of a software object on a portable computing device. Hetherington describes using on an endpoint machine existing local object-oriented resources in the form of a 'dataless' application, (Hetherington at col. 4, lines 36-46), that functions when data conforming to an object-oriented class construct is supplied to the portable computing device. (Hetherington at col. 2, lines 41-58.) In addition, the endpoint machines, depicted in Fig. 1, are laptops, PCs, and possibly workstations. (See also Hetherington at col. 5, lines 41-55.) Hetherington does not depict or describe any handheld portable computing devices.

Hickey describes an application having a user interface operating on a first computer, and Hickey describes intercepting "the I/O stream [of the application] and translat[ing] the user interface for use on a portable terminal." (Hickey at col. 3, lines 19-20.) The translation takes place in a device that is "interposed between the application and the portable terminal." (Hickey at col. 3, lines 3-5.) Hickey does not describe generating a software object that provides a graphical human-machine interface when operating on a handheld portable computing device.

Hickey and Hetherington would not have been combined with Wang because such a combination would have changed the principle of operation of at least one of the references. An invention is not obvious over references if the combination of the references would change the principle of operation of one of the references. MPEP § 4132.01 (citing *In re Ratti*, 270 F.2d 810 (CCPA 1959)). Hickey describes a

translation. Hickey's invention "intercepts the I/O stream [of the application] and translates the user interface for use on the portable terminal." (Hickey at col. 3, lines 19-20.) Wang describes a Java™ Calendar program that itself operates on a remote computer. (Wang at col. 10, lines 48-54.) Hetherington describes a dataless application operating on an endpoint machine that receives data conforming to an object-oriented class construct. If Wang's calendar program or Hetherington's dataless application were operated on a handheld device as described in Hickey, there would be no I/O stream from a first computer for Hickey's invention to translate. Similarly, Hickey's invention could not be used to translate the I/O stream of Wang's or Hetherington's applications running on a first computer, because the applications are not running on the first computer; the applications are running on the remote computer.

Accordingly, amended independent claim 1 and dependent claims 2, 3, 5, and 6 are patentable over Hickey, Hetherington, and Wang, whether taken alone or in combination.

Independent Claim 8

Amended independent claim 8 recites a module that operates on a computer to allow a user of the computer to generate a software object that provides when operating on a handheld computing device a graphical human-machine interface. For the reasons stated above with respect to amended independent claim 1, Hickey, Hetherington, and Wang do not teach or suggest, by themselves or in any combination, the subject matter of amended independent claim 8. Also, as asserted above, the references cannot be combined without changing the principle of operation of at least one reference.

Accordingly, amended independent claim 8 and dependent claims 9, 11, and 12 are patentable over Hickey, Hetherington, and Wang, whether viewed alone or in combination.

Independent Claim 14

Amended independent claim 14 recites a method of controlling a process that comprises a software object, generated on a computer, that provides a graphical human-machine interface when operating the software object on a handheld portable computing device. For the reasons stated above with respect to amended independent claim 1, Hickey, Hetherington, and Wang do not teach or suggest, by themselves or in any combination, the subject matter of amended independent claim 8. Also, as asserted above, the references cannot be combined without changing the principle of operation of at least one reference.

Accordingly, amended independent claim 14 and dependent claims 15 and 16 are patentable over Hickey, Hetherington, and Wang, whether taken alone or in combination.

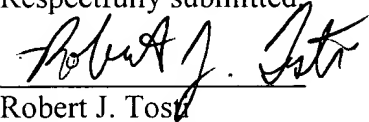
CONCLUSION

In view of the foregoing, Applicants respectfully request that the rejections be reconsidered and withdrawn. Applicants submit that the claims are in condition for allowance.

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Respectfully submitted,



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